



UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

|                            |   |                                       |
|----------------------------|---|---------------------------------------|
| CHARLES DUNLAP,            | ) |                                       |
|                            | ) |                                       |
| Plaintiff,                 | ) | No: 3:24-cv-00049                     |
|                            | ) | JURY DEMAND                           |
| v.                         | ) |                                       |
|                            | ) | Judge: William L. Campbell, Jr.       |
| CEVA LOGISTICS U.S., INC., | ) |                                       |
|                            | ) | Magistrate Judge: Jeffery S. Frensley |
| Defendant.                 | ) |                                       |

JOINT MOTION TO MODIFY  
INITIAL CASE MANAGEMENT ORDER

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule of Court 6.01(a), Plaintiff, Charles Dunlap (“Plaintiff”), and Defendant, CEVA Logistics U.S., Inc. (“Defendant”) (jointly referred to as the “Parties”), respectfully move the Court to grant an extension of an additional thirty days, until **June 30, 2024**, for the Parties to exchange their Initial Disclosures.

The Parties further seek an extension of an additional thirty days, until **August 1, 2024**, of the Parties’ deadline to file motions to amend or to add parties to the suit.

The Parties seek such extensions due to scheduling conflicts from both Parties’ counsel.

All Parties are represented by counsel.

Respectfully submitted,

/s/ E. “Soni” Wroblewski  
D. Gil Schuette (#030336)  
Elizabeth “Soni” Wroblewski (#041845)  
SIMS|FUNK, PLC  
3102 West End Ave., Suite 1100  
Nashville, TN 37203  
(615) 292-9335  
[gschuette@simsfunk.com](mailto:gschuette@simsfunk.com)  
[swroblewski@simsfunk.com](mailto:swroblewski@simsfunk.com)

/s/ Mark J. Levine

Mark J. Levine (admitted *pro hac vice*)

ANDREWS MYERS P.C.

1885 Saint James Place, 15th Floor

Houston, TX 77056

(713) 634-4471

[mlevine@andrewsmyers.com](mailto:mlevine@andrewsmyers.com)

*Attorneys for Defendant*

*CEVA Logistics U.S., Inc.*

/s/ Roland Mumford (by E. Soni Wroblewski

with permission given by email)

Roland Mumford (#026495)

LAW OFFICES OF ROLAND MUMFORD & ASSOC.

242 West Main St., No. 223

Hendersonville, TN 37075

(615) 348-0070

[roland@mumfordlaw.net](mailto:roland@mumfordlaw.net)

*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that on this 23rd day of May, 2024, a copy of the foregoing is being served via the court's electronic filing system and/or by email on:

Roland Mumford  
LAW OFFICES OF ROLAND MUMFORD & ASSOC.  
242 West Main St., No. 223  
Hendersonville, TN 37075  
[roland@mumfordlaw.net](mailto:roland@mumfordlaw.net)

*Attorney for Plaintiff*

/s/ E. Soni Wroblewski